

Decommissioning gravity-fed heated water units

Plumbing Advisory Note

Issued March 2026

This advisory note clarifies that gravity-fed units must be appropriately decommissioned and removed when being replaced.

Regulatory intent

The requirement for the removal of existing in roof gravity-fed hot water storage systems applies when a system is replaced with any other type of hot water heater.

This includes, but is not limited to:

- heat pump systems
- gas or electric storage systems
- continuous flow systems
- solar hot water systems
- like-for-like gravity-fed hot water services
- electric resistance water storage heaters

The intent of this requirement is to ensure:

- elimination of risks associated with deteriorated or partially decommissioned tanks, including structural loading, water retention, collapse hazards and corrosion impacts.
- avoidance of future reconnection or continued use of obsolete technology that does not comply with current efficiency, safety and performance expectations.
- clear, auditable compliance with plumbing, electrical and building safety obligations.

These risks remain relevant regardless of the type of replacement hot water appliance being installed.

Scope of mandatory removal

Removal of the in roof gravity tank is generally expected as part of any compliant replacement activity unless a specific exemption applies.

Legislative requirements

Section 71 of the *Water Industry Act 2012* permits the Technical Regulator to issue '*public warning statements about unsuitable components, practices etc.*'

To be considered compliant, decommissioning must ensure that the previous system is:

- permanently disconnected from water and electricity (where applicable)
- fully drained
- removed from the roof space unless an applicable exemption is granted

This ensures both immediate and ongoing safety and removes ambiguity for future occupants, inspectors and tradespeople.

Exemptions

The Office of the Technical Regulator (OTR) recognises that, in some cases, the complete removal of an in roof gravity tank may introduce disproportionate risk or may no longer be reasonably practicable.

An exemption from removal may be considered only under the following limited circumstances:

1. Structural integrity risk

Where a suitably qualified building practitioner determines that removal of the in roof tank would compromise the structural integrity of the building, including:

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- risks associated with disturbing brittle, aged or load-bearing roof members
- scenarios where removal would create a structural safety hazard greater than leaving a fully drained and decommissioned vessel in place

Supporting documentation must be provided.

1. Interference with feasible installation of solar VP

Where removal of the tank is not possible without preventing the feasible placement of solar photovoltaic (PV) panels and no alternate placement exists.

This exemption recognises the importance of facilitating renewable energy installation while managing competing roof space constraints

2. Upper-storey extensions built over an existing unit

Where the residence has undergone an upper-storey extension constructed above or around the original gravity tank, and removal is no longer physically possible without major building demolition.

In these cases, the tank must still be fully drained, decommissioned and rendered permanently inoperable.

3. Compliance and documentation

Where an exemption is approved, OTR require the following declarations to be included in the relevant compliance documentation (e.g., Plumbing Certificate of Compliance, and where applicable, Electrical Certificate of Compliance):

- confirmation that the gravity-fed system has been fully drained
- confirmation that it has been permanently disconnected from all services
- confirmation that it has been rendered inoperable and poses no ongoing safety risks
- details of the basis for the exemption (structural risk, PV feasibility issue or upper-storey constraint)

This documentation supports audit requirements and provides assurance of compliance.

4. Summary

- removal of in roof gravity-fed hot water systems is required for all replacement scenarios, regardless of the new system type.
- exemptions are limited and only apply where removal is unsafe or no longer practical due to structural, PV

feasibility or architectural constraints.

- proper decommissioning and documentation remain mandatory even where an exemption applies.

This approach ensures safety, compliance and consistency across industry practice while allowing flexibility in exceptional cases.

If you require further guidance or wish to discuss a specific installation scenario, please contact the Office of the Technical Regulator.

Contact the Office of the Technical Regulator for more information

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